

POWERS WATER COMPANY, INC.

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December 29, 2014

Illinois Commerce Commission
Chief Clerk
527 East Capitol Avenue
Springfield, IL 62701

RE: Code Part 280.15 Implementation Plan

Powers Water Company is a small utility of 67 customers within the Landings Subdivision in Huntley, IL, providing water service to residential customers. This utility is operated and maintained on a manual basis primarily by one person, Amanda Rasmus and overseen by myself, John Hill. The daily on-site operations are contracted to Jeremy Lin of M.G.D Water Solutions and subcontracted to Ed Fox. We currently do not have a website for our utility and all requests for information are handled on a manual basis and are mailed, faxed or emailed to the customer per their request.

Since we are a small utility that is operated on a manual basis primarily by one person, many of the requirements will take up to 6 months to complete, while some can be completed immediately, as they are simple changes or additions to the procedures we already have in place. Following is an outline of each Subpart and Section, with a timeline listed for each.

At this time the cost of implementation is unknown.

A handwritten signature in blue ink, appearing to read "John P. Hill". The signature is stylized with a large, looping "J" and a cursive "Hill".

John P. Hill, President

JPH/ar/Attachment

SUBPART B: APPLICATIONS FOR UTILITY SERVICE

Section 280.30 Application

Our utility currently does not have a formal application for a person to obtain water service. The current process involves the new resident contacting us by telephone to set up their account and to start water service on the business day of their choice. We can implement a formal application including all new requirements by March 1, 2015.

Section 280.35 Revert to Landlord/Property Manager Agreements

Currently our utility only has one residence that is renter occupied. Service was established by the landlord and in the landlord's name but in care of the tenant, with billing sent to the service address. We can implement a formal written prearrangement including all new requirements by March 1, 2015.

SUBPART C: DEPOSITS

Section 280.40 Deposits

We currently do not require deposits to establish water service due to the small size of our service area and have no immediate plans to require them, unless we are required to.

Section 280.45 Deposits for Low Income Customers

Please see "Section 280.40 Deposits".

SUBPART D: REGULAR BILLING

Section 280.50 Billing

Our billing is completed monthly, with all services billed after they have been used and mailed to each customer at the preferred mailing address, in a sealed envelope. We never bill for usage in advance. We currently do not have a line item indicating "service address" on the bills. However, we will revise billing content to include all new requirements applicable to water utilities by March 1, 2015. We currently do not have a budget plan offered.

SUBPART E: PAYMENT

Section 280.60 Payment

The methods of payment currently accepted are cash, check, cashier's check, money order or Electronic Funds Transfers. We currently do not accept credit cards, due to the cost which would be incurred on both the company and customer. The late payment timeframe will be updated as of January 1, 2015 to conform to the new requirements. All payments are applied to the customer's account the day they are received. Late fees of 1.5% are only assessed if the past due amount is not paid by the next billing cycle, which is a minimum of 5 days after the previous bill was due. We will implement all new billing requirements by March 1, 2015.

Section 280.65 Late Payment Fee Waiver for Low Income Customers

We currently do not have any customers qualified as "low income". We will implement the new late payment fee waiver immediately for any low income customers we may have in the future.

Section 280.70 Preferred Payment Date

We currently bill all of our customers on the same date, unless conditions out of our control prevent us from doing so. For example, if a customer's meter becomes defective and is noted during the meter reading, we attempt to access the customer's inside meter for a reading or place a door tag at the home, then contact them by telephone. In cases like this we may have to bill them on a later date, as the date on all bills coincides with the date the bill is mailed. We will implement a preferred payment date for eligible customers as of March 1, 2015.

Section 280.80 Budget Payment Plan

We currently do not offer a budget payment plan, but will offer it as of March 1, 2015.

SUBPART F: IRREGULAR BILLING**Section 280.90 Estimated Bills**

Actual billing is currently completed once every quarter in January, April, July and October, with estimated billing done for the two months in between. We will start to perform actual readings every second month effective immediately.

Section 280.100 Previously Unbilled Service

We are currently in compliance with this section.

SUBPART G: REFUNDS AND CREDITS**Section 280.110 Refunds and Credits**

We are currently in compliance with this section.

SUBPART H: PAYMENT ARRANGEMENTS**Section 280.120 Deferred Payment Arrangements**

We will implement all requirements of deferred payment arrangements by March 1, 2015. We currently offer deferred payments arrangements, but do not meet all of the requirements regarding billing itemization as we use QuickBooks for our billing and it has some limitations. However, we will seek assistance from QuickBooks support to meet all requirements.

Section 280.125 Deferred Payment Arrangements for Low Income Customers

We will implement all requirements of deferred payment arrangements for low income customers by March 1, 2015. We currently offer deferred payments arrangements, but do not meet all of the requirements regarding billing itemization as we use QuickBooks for our billing and it has some limitations. However, we will seek assistance from QuickBooks support to meet all requirements.

SUBPART I: DISCONNECTION

Section 280.130 Disconnection of Services

We are currently in compliance with this section and will update our disconnection notice content to conform to the new requirements immediately.

Section 280.135 Winter Disconnection of Residential Heating Services, December 1 through March 31

Not applicable. We are a water service utility.

Section 280.140 Disconnection for Lack of Access to Multi-Meter Premises

Not applicable. We have only single-meter premises.

Section 280.150 Disconnection of Master-Metered Apartment Buildings

Not applicable. We have only single-meter premises.

SUBPART J: MEDICAL CERTIFICATION

Section 280.160 Medical Certification

We will implement all requirements regarding medical certification immediately.

SUBPART K: RECONNECTION

Section 280.170 Timely Reconnection of Service

We are currently in compliance with this section.

Section 280.180 Reconnection of Former Residential Customers for the Heating Season

Not applicable. We are a water service utility.

SUBPART L: UNAUTHORIZED SERVICE USAGE

Section 280.190 Treatment of Illegal Taps

We are currently in compliance with this section.

Section 280.200 Tampering

We are currently in compliance with this section.

Section 280.205 Non-Residential Tampering

Not applicable. We service only residential properties.

Section 280.210 Payment Avoidance by Location

We will implement all requirements regarding payment avoidance by location immediately.

SUBPART M: COMPLAINT PROCEDURES

Section 280.220 Utility Complaint Process

We are currently in compliance with this section.

SUBPART N: INFORMATION

Section 280.40 Public Notice of Commission Rules

We currently do not have a website, however we will have one created by March 1, 2015. We will then have the public notice of commission rules posted on our website. We will continue to provide written notice to our customers annually of the availability of the Commission's rules.

Section 280.250 Second Language Requirements

We are currently in compliance with this section.

Section 280.260 Customer Information Packet

We will develop a customer information packet and provide it to all of our customers by March 1, 2015.

Section 280.APPENDIX A Disconnection Notice

We will update our current disconnection notice to be in compliance effective immediately.

Section 280.APPENDIX B Customer Rights

We will update our disconnection notice to include the customer rights information section effective immediately.

Section 280.APPENDIX C Public Notice

Where are we to place this public notice?

Section 280.APPENDIX Disconnection Notice Insert for Residential Gas and Electric Customers

Not applicable. We are a water service utility.